

EXHIBIT 212

Conaway, Jenna B.

From: Harry MacDougald <hmacdougald@cpdlawyers.com>
Sent: Tuesday, November 10, 2020 3:52 PM
To: Robert Sinners
Subject: Re: [EXTERNAL]RE: Data File Needed for Vote Swapping/Switching

One more thing:

I had a 45 minute call with Marilyn Marks, Director of Coalition for Good Governance about my theory. Her reactions:

1. She thought it would be extremely difficult to decipher the server logs for purposes of detecting vote swap because:
 - a. The server logs would be confounded by a multitude of anomalous entries arising from multiple failed upload attempts from the county tabulation centers. She described this scene at the Gwinnett County tabulation center that she personally observed: when the memory cards were fed into the reader to upload to the election server, the upload repeatedly failed. The staff would have to unwind the failed upload, and try again. And again. And again. Then they started trying ad hoc work-arounds, like splitting a flash drive into multiple uploads. She said the Dominion tech on site was revising the software then and there to try and fix the problem. The result being that the logs would be a mess and greatly complicate comparing entries to identify potential vote swaps.
 - b. She also indicated the county servers update the Clarity Elections servers before they update the state servers. It's not clear to me whether the state server is updated from county servers or from Clarity – she did not know.
 - c. She has not examined the logs herself, and though they would be very hard to get from Dominion or the state on a time frame that would be useful to us. I presume it's because they don't want people to see how bad it is. It remains possible that the junk log entries could be readily filtered out to enable the comparisons necessary to identify a vote swap, but that will depend on the nature of the data and the skills on your team.

Her final comment was that she hoped that Republicans would get on board with hand-marked ballots for the run-off because the current Ga. system cannot really be audited – the QR codes are not human readable.

Best of luck.

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Exhibit
0005

From: Robert Sinners <rsinners@donaldtrump.com>
Date: Tuesday, November 10, 2020 at 12:36 PM
To: Frank Strickland <fstrickland@taylorenghish.com>, Harry MacDougald <hmacdougald@cpdlawyers.com>
Cc: "Mark A. Johnson" <mjohnson@majpc.com>, "Reeves, Bert" <bert@bertreeves.com>, Don Brown

<donbrownbooks@gmail.com>

Subject: Re: [EXTERNAL]RE: Data File Needed for Vote Swapping/Switching

I can say this is a serious issue that our team has actively been investigating. We're recording all of the facts, and I think there's reason to believe this could be the case in Georgia. We are assembling a team for the recount and runoff elections. We need all hands on deck.

Please pass [this form](#) out to all of your trusted friends and colleagues. It asks for great detail so that we can vet submissions properly.

I hate to be dismissive, but we simply don't have enough credible evidence of software "glitches" at this point; most issues can be explained by user error. However, it is my belief there was a coordinated effort in some counties to disenfranchise Republican voters due to vague statutes and loopholes.

Appreciate you sending this my way, Frank.

Robert A. Sinners
Georgia State EDO Director
Donald J. Trump for President
RSinners@DonaldTrump.com
Election Incident Hotline: 470-410-8793

From: Frank Strickland <fstrickland@taylorenghish.com>
Sent: Tuesday, November 10, 2020 12:03 PM
To: Harry MacDougald <hmacdougald@cpdlawyers.com>
Cc: Mark A. Johnson <mjohnson@majpc.com>; Reeves, Bert <bert@bertreeves.com>; Don Brown <donbrownbooks@gmail.com>; Robert Sinners <rsinners@donaldtrump.com>
Subject: [EXTERNAL]RE: Data File Needed for Vote Swapping/Switching

Note to Robert Sinners.

Robert,

Harry MacDougald and I have been friends and colleagues in the legal profession for at least 30 years. He and I served for five years as the two Republican members of the Fulton County Board of Registration and Elections from 2005 to 2010. He is a solid Republican and supporter of the President. I hope you will take Harry's concept seriously. My opinion is that it should be pursued to a logical conclusion. Harry needs the granular data to accomplish that result. Perhaps you can prod someone to provide this information. Thanks.

Frank



Frank B. Strickland

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From: Harry MacDougald <hmacdougald@cpdlawyers.com>
Sent: Tuesday, November 10, 2020 11:47 AM
To: Frank Strickland <fstrickland@taylorenghish.com>
Cc: Mark A. Johnson <mjohnson@majpc.com>; Reeves, Bert <bert@bertreeves.com>; Don Brown <donbrownbooks@gmail.com>; RSinners@DonaldTrump.com
Subject: Re: Data File Needed for Vote Swapping/Switching

He has it now via the cc

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On Nov 10, 2020, at 11:42 AM, Frank Strickland <fstrickland@taylorenghish.com> wrote:

Harry should send his concept directly to Robert Sinners.

FBS

From: Mark Johnson <mjohnson@majpc.com>
Sent: Tuesday, November 10, 2020 11:34 AM
To: Harry MacDougald <hmacdougald@cpdlawyers.com>; Frank Strickland <fstrickland@taylorenghish.com>; Reeves, Bert <bert@bertreeves.com>; Don Brown <donbrownbooks@gmail.com>; RSinners@DonaldTrump.com
Subject: Data File Needed for Vote Swapping/Switching

I patch in Robert Sinner, which Frank suggested that I do. Frank, you can bring Robert up to speed.

You could also contact Robert Sinners at

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RSinners@DonaldTrump.com

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From: Harry MacDougald <hmacdougald@cpdlawyers.com>

Sent: Tuesday, November 10, 2020 11:27 AM

To: Mark Johnson <mjohnson@majpc.com>

Cc: Bert Reeves <bert@bertreeves.com>; Mr. Frank B. Strickland <fstrickland@taylorenchinese.com>;
Reynolds, Vic <D.Reynolds@cobbcounty.org>; Don Brown <donbrownbooks@gmail.com>

Subject: Re: Data File Needed for Vote Swapping/Switching

I emailed William Briggs - the creator of the chart below - last night asking how to get the detailed time series data, and explained my theory. No response yet.

It would be impossible for the Briggs chart to be prepared without time series data of some description. The question is how finely resolved it can be, and whether you can find individual database transactions indicative of vote swapping.

I have to believe the data exists. When the votes flipped in PA on election night as shown in the video clip previously circulated, that update in the results occurred because the election night reporting database was updated to that effect, and that updated result was pushed out from the election night reporting database to Decision Desk HQ and from there to the networks and then to the screen - See p. 16 of the Ramsland slide deck attached. Georgia's reporting is pushed to the public through Clarity Elections, the first listed intermediary reporting system in slide 16, attached. See also slides 30 and 31.

So somewhere in that chain there's a database transaction consisting of -x votes for Trump and +x votes Biden - the update captured on video could not have happened otherwise.

Since there's a discrete database transaction of that nature, and since we know some form of time series data exists, it remains possible if not likely that the data exists in which we can find the swap transactions as I have theorized.

If such swaps are found in the time series data, it might then be possible to trace it to a precinct's reporting, or, possibly, firmly exclude any actual voting data from any precinct as the source.

If you can identify a precinct, you can audit the precinct and see if its results were falsified. Obviously, no precinct would ever legitimately report an update of negative votes for Trump and an identical number of positive votes for Biden, so such an audit should bear fruit in terms of proving falsification of votes.

If you can rule out all precincts as the source, then you have strong evidence of a hack of the election reporting system. It would be votes created ex nihilo - without any origin in actual ballots.

If you can show either of these you have a *very* strong case for enjoining certification.

The Ramsland presentation discussed how the election reporting system can be hacked and votes injected on the server side in the context of discussing the vote flip in the Kentucky Governor's race in 2018.

I'm attaching Ramsland's slides that I screen-capped that outline at a high level how this occurs. All the little arrows are elements of the system that can be hacked according to Ramsland.

See p. 4 and 16 of the attachment.

When I first watched Ramsland's video, I was dubious of his claims that the system was vulnerable at so many points.

Then I read the Totenberg order, and the Plaintiff's cyber security experts testified that the poll book, BMD and scanner could all be hacked and votes changed - validating some of his points. Plaintiff's evidence - I think - did not much address the server side.

I would very much like to speak w/ Ramsland to explore this further, but he is hard to get a hold of for a guy like me.

Regards.

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On Nov 10, 2020, at 10:47 AM, Mark Johnson <mjohnson@majpc.com> wrote:

Hoft is on Bannon now—Harry's thesis is occurring all sorts of places

More "Glitches" in Pennsylvania: Votes for Trump Drop IN THREE

DIFFERENT COUNTIES SIMULTANEOUSLY — Almost As If It Was Coordinated

By [Jim Hoft](#)

Published November 10, 2020 at 7:30am

[500 Comments](#)

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We have now reported on several “glitches” in the ballot counting this year.

Every single “glitch” resulted in Donald Trump losing votes and Joe Biden gaining votes.

We have now witnessed these “glitches” in [Pennsylvania](#), [Virginia](#), [Michigan](#) and [Wisconsin](#).

Advertisement - story continues below

At this point there is no way to know how many times this occurred or in how many states.

Only an audit of the votes in each state will reveal the abnormalities in the voter counts.

William Briggs found an unusual drop in President Trump’s total votes in THREE DIFFERENT COUNTIES at the same time period

00:0201:52

<image003.jpg>

President Trump lost -1,063 in Allegheny; -2,972 in Bucks; -7,135 in Chester Counties at the same time period.
Joe Biden did not lose any votes.

Advertisement - story continues below

WMBriggs reported:

The early gains for Biden are from, mainly, Philadelphia, Allegheny, Montgomery, Chester and Berks counties. A simple plot (click to see: it's large) shows the size of vote additions for both candidates, when new vote totals (greater than 0) were added by county (and not all counties added votes after election day).

All goes well for Trump until 2020-11-04 21:15:00 when he loses just under 10,000 votes, but curiously from three different counties simultaneously: -1,063 Allegheny; -2,972 Bucks; -7,135 Chester. Biden never lost any votes (at least, in this late voting).

Advertisement - story continues below

Understand that this does not mean the decreases happened at this time, but that they were recorded in the official data as happening at that time. And the same is true for our next observation.

Biden's next curiosity was the big increase of 27,396 votes at 2020-11-06 08:53:00 over one consecutive reporting period. This bump is just like the blue-red F-memes you have seen: this only seems more spread out because of the finer time scale used.

These two curiosities account for a 37,263 vote swing for Biden. Biden's total, as of the end of this data, was 3,344,528, and Trump's 3,310,326. Biden therefore "won", in this dataset anyway, by 34,202 votes.

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From: Mark Johnson

Sent: Tuesday, November 10, 2020 7:59 AM

To: Bert Reeves <bert@bertreeves.com>; Harry MacDougald
<hmacdougald@cpdlawyers.com>

Subject: RE: Data File Needed for Vote Swapping/Switching

Thanks loads Bert.

Mark A. Johnson

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From: Bert Reeves <bert@bertreeves.com>

Sent: Tuesday, November 10, 2020 7:58 AM

To: Mark Johnson <mjohnson@majpc.com>; Harry MacDougald
<hmacdougald@cpdlawyers.com>

Subject: Re: Data File Needed for Vote Swapping/Switching

I forwarded Harry's email to Josh Belinfante and he has told me that he has forwarded it along to the folks in his firm who are working this. If I hear anything back from him I'll let you know. If there is anything else you need sent to him, please let me know. I am going to try and reach out to bryan tyson (elections lawyer with Taylor English Duma) today as well.

Bert Reeves
Attorney at Law

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On Nov 9, 2020, at 9:12 PM, Mark Johnson <mjohnson@majpc.com>
wrote:

Does it make sense to you Bert?

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From: Mark Johnson
Sent: Monday, November 9, 2020 6:05 PM
To: 'Reeves, Bert' <bert@bertreeves.com>
Subject: FW: Data File Needed for Vote Swapping/Switching

From: Mark Johnson
Sent: Monday, November 9, 2020 5:16 PM
To: Reeves, Bert <bert@bertreeves.com>; Reynolds, Vic <D.Reynolds@cobbcounty.org>
Cc: Harry MacDougald <hmacdougald@cpdlawyers.com>; 'Skip Chesshire' <schesshire@aol.com>
Subject: FW: Data File Needed for Vote Swapping/Switching
Importance: High

Bert and Vic—

Here is the situation. Sydney Powell called Don Brown, a Charlotte lawyer I know yesterday for his assistance.

On an e-mail thread today (which Bert was on), Don said he needed pleadings from an elections case before Judge Totenberg here, and Harry and Don have been conferring and drilling down on elections software issues, lining up expert witnesses, et al.

Harry needs specific data from the Georgia Secretary of State's office, which he outlines below.

We need to get the requested information to Harry ASAP.

Harry informs that he and Bert just spoke. So Bert, please get on this immediately.

Vic, I will call you shortly on your cell, which I just got from Skip Chesshire.

For The Republic.

Mark A. Johnson

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From: Harry MacDougald <hmacdougald@cpdlawyers.com>
Sent: Monday, November 9, 2020 5:03 PM
To: Mark Johnson <mjohnson@majpc.com>
Subject: Data File Needed for Vote Swapping/Switching

We need to test the Georgia voting results for the presence of vote swapping or switching.

This is reasonable to do because:

1. We know vote swapping or switching happens on the Dominion system.

It is shown in the 2018 Kentucky Governor's race on video tape starting at roughly 33:00 in this video https://www.youtube.com/watch?v=ficae6x1Q5A&feature=emb_logo, and in this tweet in the PA returns from election night 2020 in the Trump-Biden race: https://twitter.com/A_Blossom4USA/status/1325500457331138567

2. Georgia uses the same Dominion system as PA where vote swapping was observed on election night as shown in the tweet above.

To see if this happened in Georgia, I need the Georgia results (with as granular geographic data as is available) as they evolved over time from the first unofficial results until 99% of precincts reporting, with as fine or narrow a time step as is available.

When the election results database updates, the event is recorded in a log that has a time stamp, along with the votes accumulated as of that moment in time.

By comparing the changes in votes at each time step, we can spot likely vote swapping.

If at a given time step, Trump decreased by 10,453 votes and Biden increased by the identical number, that's a vote swap. That's what we see in the videos above and that's what we need to look for in Ga.

But to see this in the time series data, you have to catch them changing the votes for each candidate by the same amount and opposite sign at the same instant. So we need the smallest time step available to avoid

being confounded by legitimate changes in the numbers. Time steps of 1 minute or 20 minutes or an hour would be useless. Time steps of the smallest available amount are required. This information is logged at the hundredth or thousandth of a second level and should be available.

I've attached a spreadsheet with dummy data to illustrate how you would test for swapping by time-step. If the decrease in Trump and the increase in Biden net to zero, the figure in column F is zero, and it's a vote swap.

Call if there are any questions.

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